Chapter 11
Case No. 20-12411-JLG

DEBTOR'S APPLICATION FOR AN ORDER ESTABLISHING DEADLINE FOR FILING PROOFS OF CLAIM AND APPROVING THE FORM AND MANNER OF NOTICE THEREOF

TO THE HONORABLE JAMES L. GARRITY, JR., UNITED STATES BANKRUPTCY JUDGE:

The application Genever Holdings LLC (the õDebtorö), by its attorneys, Goldberg Weprin Finkel Goldstein LLP, respectfully shows this Court as follows:

- 1. The Debtor filed a voluntary petition under Chapter 11 of the Bankruptcy Code on October 12, 2021 and has continued in possession of its property as a debtor-in-possession pursuant to section 1107 and 1108 of Chapter 11 of Title 11 of the United States Code.
- 2. In furtherance of the confirmation process, the Debtor hereby seeks entry of the pre-fixed order establishing a bar date for the filing of claims in accordance with Bankruptcy Rule 3003(c)(3).
- 3. The establishment of a bar date is necessary to the efficient administration of this Chapter 11 case and will assist in evaluating the total universe of claims.
 - 4. No committee of unsecured creditors has been appointed.

WHEREFORE, the Debtor respectfully prays for the entry of the pre-fixed order, together with such other and further relief as this Court may deem just, proper and necessary.

Dated: New York, New York January 08, 2021

> GOLDBERG WEPRIN FINKEL GOLDSTEIN LLP Attorneys for the Debtor 1501 Broadway, 22nd Floor New York, New York 10036 (212) 221-5700

By: /s/ J. Ted. Donovan, Esq.